

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

**GREATGIGZ SOLUTIONS, LLC**

**Plaintiff**

**v.**

**DOORDASH, INC.**

**Defendant**

**Case No. 6:20-cv-00764-ADA**

**JURY TRIAL DEMANDED**

**CASE READINESS STATUS REPORT**

Plaintiff GreatGigz Solutions, LLC (“Plaintiff”) hereby provides the following status report in advance of the Case Management Conference (“CMC”).

**FILING AND EXTENSIONS**

Plaintiff’s Complaint was filed on August 21, 2020 [Dkt. No. 1]. There have been two extensions for a total of seventy-five (75) days for Defendant to file an answer or otherwise respond to Plaintiff’s Complaint. Plaintiff filed a First Amended Complaint on November 16, 2020 [Dkt. No. 13] thereby mooting Defendant’s motion to dismiss [Dkt. No. 12].

**RESPONSE TO THE COMPLAINT**

Defendant filed a motion to dismiss pursuant to FRCP 12(b)(6) on November 2, 2020 [Dkt. No. 12]. Plaintiff filed a First Amended Complaint on November 16, 2020 [Dkt. No. 13] thereby mooting Defendant’s motion to dismiss [Dkt. No. 12].

**PENDING MOTIONS**

To date, the only pending motion is Defendant's motion to dismiss pursuant to FRCP 12(b)(6) [Dkt. No. 12]. Plaintiff filed a First Amended Complaint on November 16, 2020 [Dkt. No. 13] thereby mooted Defendant's motion to dismiss [Dkt. No. 12].

**RELATED CASES IN THIS JUDICIAL DISTRICT**

There are seven (7) other active cases filed by Plaintiff on one or more of the asserted patents. These include the following:

<b>Case</b>	<b>Case Filing Date</b>
GreatGigz Solutions, LLC v. Angie's List, 6:20-cv-00633	July 14, 2020
GreatGigz Solutions, LLC v. Grubhub Inc., 6:20-cv-00628	July 13, 2020
GreatGigz Solutions, LLC v. Maplebear Inc. d/b/a Instacart, 6:20-cv-00737	August 14, 2020
GreatGigz Solutions, LLC v. Lyft, Inc. 6:20-cv-00651	July 17, 2020
GreatGigz Solutions, LLC v. HEB Grocery Company, LP; H-E-B, LP; and H.E.B., Inc., 6:20-cv-00934	October 08, 2020

GreatGigz Solutions, LLC v. Freelancer, 6:20-cv-00738	August 14, 2020
GreatGigz Solutions, LLC v. Neighborfavor, Inc., 6:20-cv-00935	October 8, 2020

### **IPR, CBM, AND OTHER PGR FILINGS**

To date, there are no IPR, CBM or other PGR filings.

### **NUMBER OF ASSERTED PATENTS AND CLAIMS**

To date, Plaintiff has asserted four patents and four claims against Defendant.

### **APPOINTMENT OF TECHNICAL ADVISOR**

The parties do not request appointment of a technical advisor to assist the Court with claim construction or other technical issues.

### **MEET AND CONFER STATUS**

Plaintiff and Defendant conducted a meet & confer conference on November 13, 2020. Defendant has indicated that it plans to move to transfer this case to the Northern District of California and plans to move to dismiss all claims under 35 U.S.C. § 101. Given the recent *In re Apple, Inc.* case advising that judicial economy requires that transfer motions be decided before the merits, Defendant will file its transfer motion first. Defendant is also considering other motions based on its position that it does not believe the complaint states a cognizable claim.

Dated: November 17, 2020

Respectfully Submitted

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